

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHARLES WILLIAMS

Plaintiff

Docket No. 07 cv 7720
(CM) (RLE)

-against-

AFFIDAVIT

PALLADIA, INC. and CORINE WORKMAN

Defendants

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STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

Lizzette Danowsky, being duly sworn deposes and says:

1. I am a Program Aide/House Monitor at Palladia and my supervisor is Corinne Workman. I submit this affidavit in support of defendants' motion for summary judgment dismissing the action.

2. I have been employed at Palladia since January, 2004. In addition to working as a Program Aide/House Monitor for Palladia, I also work part time for a private security agency "Front Line Security" that also provides security for some of Palladia's buildings. On Tuesday, October 31, 2006, I was on duty at Flora Vista for the 12:00 midnight to 8:00 a.m. shift working for Front Line

3. At approximately 12:20 a.m. I went over to Dreitzer House to pick up Flora Vista's keys. I noticed that there was no one sitting at the security desk. I waited a few minutes and then checked the security log book to see who was on duty.

Charles Williams was signed in by Ms. Sherri Manson and he himself had signed in at 12:00 a.m.

4. Seeing no one I signed the security log at 12:20 a.m. that I was on site and that "nobody @ D.H building was secure – quiet."

5. I waited around for Mr. Williams to show up and around 1:00 a.m. I decided to check the building. I checked the bathrooms, staff offices and stairwells for all seven floors but could not find any sign of Charles Williams. I also tried to call him on his cell phone but it was off.

6. I then called Doretha Gilmore, the administration assistant at Dreitzer, who was the emergency contact person. I explained to Ms. Gilmore that I could not find Mr. Williams and that I tried to call him on his cell phone.

7. Ms. Gilmore asked me to stay at the building and make rounds again and to tell Mr. Williams to call her when he arrived. I made rounds and although I didn't see Mr. Williams I did see his back pack in one of the rooms. At or about 3:42 a.m. Charles Williams entered the building. I asked him where he had been. He said that he was feeling sick and had gone to the pharmacy to get Tylenol or some kind of medication.

8. I told him to call Ms. Gilmore.


9. A copy of my memorandum describing the incident is annexed as Exhibit "AW."

10. I understand that Mr. Williams claims that I was coerced by Ms. Workman to lie about the incident based upon a purported discrepancy between my testimony at the two unemployment hearings. I don't know why the transcript of the

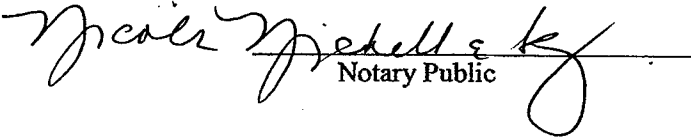
second hearing states that I said I saw Mr. Williams at 2:00 a.m. as indicated by the Administrative Law Judge, as my testimony at the first hearing and my memo clearly indicates that I first saw him at 3:42 a.m. and that is what I recollect.

11. If I made a mistake in my testimony at the second hearing, which testimony was by telephone, than it was solely a mistake on my part and had nothing to do with Ms. Workman. She never told me to lie about anything nor did she coerce me, threaten or do anything to me so as to change my testimony in any manner.

12. Mr. Williams' allegation that I was coerced into lying about what occurred on the night of October 31, 2005 is simply untrue and unsupported by any evidence.


Lizzette Danowsky

Sworn to before me this
26 day of June, 2008


Notary Public

